
Exhibit “A”

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

MICHAEL T. DREHER,
Individually and on behalf of a class
similarly situated persons,

Plaintiff,

v.

Civil Action No. 3:11cv624 (JAG)

EXPERIAN INFORMATION SOLUTIONS, INC.,
et al.

Defendants.

DECLARATION OF MICHAEL T. DREHER

Pursuant to 28 U.S.C. § 1746, I, Michael T. Dreher declare the following:

1. I am an adult and competent to make this declaration.
2. I have personal knowledge of the facts alleged herein.
3. I am forty-three years and reside in Fairfax County, Virginia.
4. I have a Bachelor's degree in cartography and geographic information systems from University of Wisconsin which I obtained in 1993. I also have a Master's degree in civil engineering from Virginia Tech which I obtained in 2005.
5. I have never been charged with or even accused of committing fraud or another crime and do not have a criminal record.
6. In November 2010, my security clearance was being processed by the National Security Agency ("NSA"). During this process, I was advised by an NSA investigator that they had discovered a delinquent account on my credit reports while they were processing my security clearance. On my credit report was a delinquent, Advanta Bank Corporation ("Advanta Bank") and Advanta Credit Cards account.
7. I was told by the NSA investigator that I needed to prove payments on the Advanta Bank and Advanta Credit Cards account or it could severely impact my Top Secret Level III clearance.
8. I have never applied for a credit card with Advanta Bank or Advanta Credit Cards.
9. The Advanta Bank and Advanta Credit Cards accounts on my credit report did not belong to me.
10. Prior to the Advanta Bank and Advanta Credit Cards accounts appearing on my credit report, I was not familiar with either entity.
11. The only contact information I had for Advanta Bank or Advanta Credit Cards was what was shown on my credit report.
12. I have never had any dealings with Advanta Corp.

13. After getting the call from the NSA investigator, I had multiple conversations with them trying to convince them this account was not mine.

14. I also pulled a credit report and was able to see the Advanta Bank and Advanta Credit Cards derogatory accounts for myself. Based on this information, I wrote a letter to what at that time appeared to be the company that was reporting this account that wasn't mine on my credit report. I sent the letter to the address listed on my credit reports. It never occurred to me that Experian and the credit bureaus would not provide the correct information for the entity that was reporting this information on my credit report.

15. In my March 2011 correspondence to Advanta Credit Cards, I disputed owning the Advanta accounts. I requested some verification that I owed this debt, including documentation that indicated that I had applied for credit with Advanta Bank or Advanta Credit Cards. I also informed Advanta Credit Cards that all three major credit bureaus were reporting the inaccurate information in my credit files.

16. I believed the correspondence was going to resolve all of the stress and embarrassment created by these Advanta accounts. However, I did not receive a response from Advanta Credit Cards even though I had a certified mail, return receipt confirmation that Advanta had received my March 2011 correspondence.

17. On April 15, 2011, I sent a follow-up correspondence to Advanta Credit Cards because I did not receive a response to my March 2011 correspondence and Advanta Credit Cards continued to report the inaccurate information on my credit reports. The substance of the April 15, 2011, correspondence was similar to the March 2011 correspondence.

18. I received a response on Advanta Credit Cards letterhead dated April 18, 2011, which acknowledged that Advanta Credit Cards received my correspondence. Enclosed with the April 18, 2011 correspondence was a copy of my alleged online credit card application without any signature and billing statements from March 2011.

19. I did not fill out any online application, never applied for the Advanta Bank or Advanta Credit Cards accounts and did not authorize anyone to act on my behalf.

20. At no time did I have any communication, whether written or verbal, with any employee of Advanta Bank and/or Advanta Credit Cards or anyone on their behalf.

21. I did not even know of the aforementioned account's existence until I received the information from the NSA investigator processing my security clearance.

22. On May 23, 2011, I sent follow-up correspondence to Advanta Credit Cards instructing it to delete the inaccurate information from my credit files. After receiving no response to this correspondence, I lost hope that Advanta Credit Cards would fix their mistake. I couldn't understand why they refused to look into the matter and remove this negative information from my credit file.

23. After that, I directly contacted Experian, Equifax, and Trans Union to provide them with information to determine the Advanta Credit Cards account was inaccurate. In my letters to the credit bureaus, I detailed that I did not own the Advanta Credit Card account, that I never lived or worked in the state of Indiana, and that I had never been employed at Arnie's Bowling Rec. With my letters, I also enclosed all three correspondences that I sent to Advanta Credit Cards regarding the inaccurate information it published on my credit reports.

24. Again, despite these efforts the account information was verified and remained on my credit report.

25. Through the deposition of Cardworks' employees in this litigation, I later learned the April 18, 2011 correspondence did not actually come from Advanta Credit Cards, but was actually sent by Cardworks on Advanta Credit Cards letterhead.

26. I also learned that Advanta Bank and Advanta Credit Cards don't exist. Instead, Cardworks is the entity that responded to my letters and put this negative information in my credit file.

27. If I had known that the Advanta accounts were being reported/controlled by Cardworks, I definitely would have contacted Cardworks directly.

28. As a victim of identity theft, I feel the lack of transparency caused additional stress and wasted hours of my time writing letters to some unknown third party.

29. Experian and the credit bureaus market themselves as having accurate information and wanting to prevent identity theft (like I suffered), so I was surprised to learn that all this time it wasn't Advanta Bank or Advanta Credit Cards that was reporting the information in my credit file.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED this 28 day of November 2012.

A handwritten signature in dark ink, appearing to read "Michael T. Dreher", is written over a horizontal line.

Michael T. Dreher